

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CASEY
KIRSCHNER; ALLCORE DEVELOPMENT
LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader
Plaintiff, Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,

Interpleader Defendants,
Interpleader Counter-Plaintiffs.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL DOCUMENTS IN
SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE TO FILE
THIRD AMENDED COMPLAINT**

In accordance with the Agreed Protective Order in this case (Dkt. 55) and for reasons further stated in the accompanying Memorandum of Law, Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. respectfully seek leave to file under seal the unredacted version of their (proposed) Third Amended Complaint, attached to Plaintiffs' Motion for Leave to File Third Amended Complaint ("Motion to Amend"); the unredacted version of Plaintiffs' Memorandum of Law in Support of their Motion to Amend; the unredacted version of the Declaration of Claudia M. Barrett in Support of Plaintiffs' Motion to Amend; and the following exhibits being concurrently filed with the Barrett Declaration:

- i. Exhibit 1 is a highly-sensitive, non-public document involving a presentation in a related matter;
- ii. Exhibit 5 is a letter from Rodney Atherton to Casey Kirschner, among others;
- iii. Exhibit 10 is a messaging chain in which Casey Kirschner is included;
- iv. Exhibit 14 is a spreadsheet documenting financial figures in relation to several entities involved in this case;
- v. Exhibit 15 is another messaging chain in which Casey Kirschner is included.

Pursuant to the Agreed Protective Order, Defendant Casey Kirschner has designated Exhibits 5, 10, 14, and 15 as "Confidential" under the Protective Order. Under Local Civil Rule 5, Casey Kirschner "must file a response to [this] motion complying with [the] requirements" of Local Civil Rule 5(C)(2), (3), and (4), justifying the sealing of the materials he designated as "Confidential," along with a proposed order.

Dated: April 1, 2022

Respectfully submitted,

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/s/ Michael R. Dziuban
Elizabeth P. Papez (*pro hac vice*)
Patrick F. Stokes (*pro hac vice*)
Claudia M. Barrett (*pro hac vice*)
David W. Casazza (*pro hac vice*)
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Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

Casey Kirschner
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By email: casey.kirschner@gmail.com

s/ Michael R. Dziuban

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